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IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

NEHEMIAH ROBINSON, Plaintiff, **v.** **T. CATLETT, et al.,** Defendants.	08-CV-00161-H (BLM) **DEFENDANTS GARRETT, ARIVIZU, PRICE, CATLETT, BOURLAND, TILTON, JOHNSON, OCHOA, JANDA, NELSON, WHIDMAN, NORIEGA, O'SHAUGHNESSY, CORREA, SALGADO, AND BALL'S RESPONSES/OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant J. Salgado responds/objects to interrogatory nos. 1-19, Defendant J. Tilton responds/objects to interrogatory nos. 1-23, Defenant K. Ball responds/objects to interrogatory nos. 1-19, Defendant B. Garrett responds/objects to interrogatory nos. 1-11, Defendant G. Janda responds/objects to interrogatory nos. 1-19, Defendant R. Johnson responds/objects to interrogatory nos. 1-17, Defendant R. Nelson responds/objects to interrogatory nos. 1-19, Defendant T. Ochoa responds/objects to interrogatory nos. 1-17, Defendant W. Price responds/objects to interrogatory nos. 1-17, Defendant R. Widmann responds/objects to interrogatory nos. 1-10, Defendant M. Bourland responds/objects to interrogatory nos. 1-17, Defendant M. Arvizu responds/objects to interrogatory nos. 1-11, Defendant T. Catlett responds/objects to interrogatory nos. 1-24, Defendant M. Correa responds/objects to interrogatory nos. 1-19, Defendant D. Noriega responds/objects to interrogatory nos. 1-12, Defendant V. O'Shaughnessy responds/objects to interrogatory nos. 1-14, and all Defendants object to any other interrogatory in Plaintiff's First Set of Interrogatories as follows: burdensome and oppressive because the interrogatories are premature in that Defendants' motion to dismiss (which seeks to dismiss the entire complaint) is pending; violate privacy rights; are vague and ambiguous; are not relevant to any claim or defense or to the subject matter of the action; and violate attorney-client privilege, and/or work product doctrine. Defendants are in the process of filing an ex parte application to stay discovery until after the Court's ruling on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint.

Dated: September 10, 2008

Respectfully submitted,

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DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **Nehemiah Robinson v. T. Catlett, et al.**

No.: **08-CV-00161-H (BLM)**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On September 10, 2008, I served the attached **DEFENDANTS GARRETT, ARIVIZU, PRICE, CATLETT, BOURLAND, TILTON, JOHNSON, OCHOA, JANDA, NELSON, WHIDMAN, NORIEGA, O'SHAUGHNESSY, CORREA, SALGADO, AND BALL'S RESPONSES/OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

Nehemiah Robinson
J-71342
Calipatria State Prison
P.O. Box 5008
Calipatria, CA 92233-5008
In Pro Per
J-71342

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on September 10, 2008, at San Diego, California.

Laura Ruiz	Laura Ruiz
Declarant	Signature

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